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3/26/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

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)
Plaintiff Steven Hobbs Sr,
US Debt Buyers LLC)
)
v.)
)
)
Defendant Igor Goncharko, 5120 South)
Coldwell Banker, Stewardship Group LLC,
Stewardship Group Washington Park)

**United States District Court
Northern District of Illinois**

**1:25-cv-03398
Judge Lindsay C. Jenkins
Magistrate Judge Beth W. Jantz
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COMPLAINT

In the United States District Court for the Northern District of Illinois

Steven Hobbs Sr, and US Debt Buyers LLC, Plaintiffs,

v.

Igor Goncharko, 5120 South LLC, The Stewardship Group LLC, The Stewardship Group Washington Park, LLC, Coldwell Banker Realty, its Leasing Agent, and its Dual Broker, Defendants.

Case No.: [to be assigned]

****COMPLAINT****

Plaintiffs Steven Hobbs Sr., and US Debt Buyers AI LLC dba US Debt Buyers LLC (collectively, "Plaintiffs") bring this action against Defendants Igor Goncharko, 5120 South LLC, The Stewardship Group LLC, The Stewardship Group Washington Park, LLC, Coldwell Banker Realty, its Leasing Agent, and its Dual Broker (collectively, "Defendants") for damages and injunctive relief arising from premises liability, mechanics lien enforcement, retaliation, wrongful eviction, discrimination, and fraud related to the property at 5120-26 S. Michigan Avenue, Chicago, IL 60615. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1332 (diversity of citizenship).

Jurisdiction

1. This Court has federal question jurisdiction under 28 U.S.C. § 1331 because this arises under the Fair Housing Act (42 U.S.C. §§ 3601 et seq.) and 42 U.S.C. § 1981.
2. This Court has diversity jurisdiction under 28 U.S.C. § 1332 because the parties are of diverse citizenship and the amount in controversy exceeds \$75,000.
3. Venue is proper in this district under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred at 5120-26 S. Michigan Avenue, Chicago, IL.

Parties

4. Steven Hobbs Sr. is a resident of Chicago, Illinois, at 5126 S. Michigan Ave #3S, a commercial mortgage broker with over 30 years of experience, and owner of US Debt Buyers AI LLC.
5. Scye Hobbs, age 22, is a resident of Chicago, Illinois, an adult college student, and former co-tenant at 5126 S. Michigan Ave #3S, who authorizes Steven Hobbs Sr. to argue on his behalf.
6. US Debt Buyers AI LLC, dba US Debt Buyers LLC is a limited liability company organized under Illinois law, with its principal place of business in Chicago, Illinois, owned by Steven Hobbs Sr.
7. Igor Goncharko is a citizen of Illinois, the current owner of 5120-26 S. Michigan Avenue, responsible for its leases, maintenance. Owner of 5120 South LLC.

8. 5120 South LLC is a limited liability company organized under Illinois law, with its principal place of business in 5120 S. Michigan Ave Chicago IL 60615, current owner of the property.

9. The Stewardship Group LLC and The Stewardship Group Washington Park, LLC are limited liability companies organized under Illinois law, with principal places of business in Chicago, IL, prior owners of the property.

10. Coldwell Banker Realty is a corporation organized under Illinois law, with its principal place of business in 1314 E. 47th st Chicago IL 60656, involved in leasing and sales.

11. The Leasing Agent and Dual Broker are individuals employed by Coldwell Banker Realty, whose citizenship will be determined upon discovery.

Facts

12. Prior to April 2024, Steven Hobbs Sr., a commercial mortgage broker with over 30 years of experience, owned and operated US Debt Buyers AI LLC. He and his son, Scye Hobbs, were co-tenants at 5126 S. Michigan Avenue, Unit 3S, Chicago, IL 60615.

13. In April 2024, Plaintiffs filed a mechanics lien on the property at 5120-26 S. Michigan Avenue for \$50,000 (later increased to \$78,000) due to unpaid consulting services and a breached purchase agreement with The Stewardship Group Washington Park, LLC, the prior owner.

14. In May 2024, Igor Goncharko and 5120 South LLC purchased the property from The Stewardship Group Washington Park, LLC without releasing the mechanics lien, assuming it. The sale lacked City of Chicago Department of Housing (DOH) approval under a 5-year ERAMP \$75,000 grant covenant, making it fraudulent. Coldwell Banker Realty and its Dual Broker represented both seller and buyer, violating Illinois Mechanics Lien Act (770 ILCS 60).

15. Prior to 2025, The Stewardship Group Washington Park, LLC, and Coldwell Banker Realty (via its Leasing Agent) leased the property to Plaintiffs for \$2,000/month, exceeding the ERAMP grant maximum rent cap of \$1,650, violating grant restrictions and tenant protections, resulting in fraudulent rental practices and overcharges.

16. On January 15, 2025, 5120 South LLC filed an eviction and judgment against Plaintiffs without legal service, unbeknownst to them. The case was continued to February 25, 2025, where Plaintiffs plan to inform the court of this federal action and move to dismiss.

17. On February 6, 2025, Steven Hobbs Sr. slipped on black iced concrete steps at 5126 S. Michigan Avenue, Unit 3S, sustaining four transverse process fractures (L2-L5) due to Defendants' failure to maintain safe premises—no salting, inadequate lighting, missing handrails, and water leakage from an upper level—posing severe pain, long-term disability risk, and potential need for spinal surgery.

18. Post-fall, Defendants refused to satisfy the \$78,000 mechanics lien, retaliated with a fraudulent 5-day eviction notice on February 15, 2025, and pursued unlawful eviction, damaging Plaintiffs' credit and public records.

19. Defendants' racially motivated actions denied Plaintiffs a fair opportunity to purchase the property, violating federal and state laws.

Causes of Action

First Cause of Action: Premises Liability & Negligence

20. Defendants failed to maintain safe premises, violating their duty under the Illinois Premises Liability Act (740 ILCS 130/), causing Steven Hobbs Sr.'s fall and injuries on February 6, 2025.

Second Cause of Action: Negligence Per Se (Building Code Violations)

21. Defendants violated Chicago Municipal Code § 13-160-040 and Building Code § 13-160-720 by failing to salt, provide adequate lighting, and install handrails, contributing to the hazardous conditions.

Third Cause of Action: Mechanics Lien Enforcement & Unjust Enrichment

22. Defendants refuse to pay a valid \$78,000 mechanics lien under the Illinois Mechanics Lien Act (770 ILCS 60), unjustly enriched by retaining Plaintiffs' services and breaching a purchase agreement.

Fourth Cause of Action: Retaliation & Wrongful Eviction

23. Defendants issued a fraudulent 5-day eviction notice on February 15, 2025, and pursued unlawful eviction in retaliation for Plaintiffs' legal actions, violating the Illinois Retaliatory Eviction Act (765 ILCS 720/1).

Fifth Cause of Action: Discrimination & Civil Rights Violations

24. Defendants' racially motivated denial of Plaintiffs' purchase opportunity violates the Fair Housing Act (42 U.S.C. §§ 3601 et seq.) and 42 U.S.C. § 1981.

Sixth Cause of Action: Fraud & Misrepresentation

25. Defendants engaged in deceptive leasing (overcharging rent beyond ERAMP limits) and fraudulent sale practices (lacking DOH approval), causing financial harm.

Damages and Relief Sought

Plaintiffs request:

A. Compensatory Damages:

1. For Steven Hobbs Sr.'s fall and personal injury:

- Medical Expenses (past and future, including potential spinal surgery): \$750,000
- Lost Wages & Future Earning Capacity: \$750,000
- Pain & Suffering: \$1,250,000
- Permanent Disability & Loss of Quality of Life: \$1,000,000

Total: \$3,750,000

2. For mechanics lien and breach of contract: \$78,000
3. For retaliation, harassment, and fraudulent leasing: \$250,000

****Total Compensatory Damages**:** \$4,078,00

B. Punitive Damages:

1. For the fall and gross negligence: \$2,500,000
2. For willful misconduct in retaliation, discrimination, and fraud, as determined by the Court.

C. Other Relief:

1. Satisfaction of the \$78,000 mechanics lien plus accrued interest.
2. Injunctive relief to halt unlawful eviction actions and tenant harassment.
3. Removal of negative credit and public records from the January 15, 2025, eviction filing.
4. Any further relief deemed just and proper.

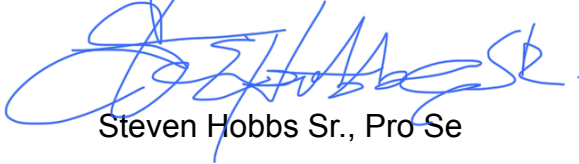
Jury Demand

Plaintiffs demand a trial by jury on all triable issues.

D. Plaintiffs request that the Court order the wrongful eviction case filed by Defendant 5120 South LLC on January 15, 2025, in state court, be sealed and removed from all credit reporting agencies and rental databases, to prevent further harm to Plaintiffs' credit and rental history caused by Defendants' retaliatory actions.

Dated: March 26, 2025

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Steven Hobbs Sr.", is written over the typed name.

Steven Hobbs Sr., Pro Se

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US Debt Buyers AI LLC, by Steven Hobbs Sr., its Manager

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